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GARY M. RESTAINO 1 2021 DEC 22 PM 12: 05 United States Attorney District of Arizona 2 CLERK US DISTRICT COURT DISTRICT OF ARIZONA RYAN P. DeJOE 3 Assistant U.S. Attorney United States Courthouse 405 W. Congress Street, Suite 4800 4 Tucson, Arizona 85701 Telephone: 520-620-7300 Email: ryan.dejoe@usdoj.gov 5 CR21-03239 TUC-JGZ(EJM) 6 Attorneys for Plaintiff 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF ARIZONA 9 United States of America, 10 Plaintiff, **INDICTMENT** 11 **VIOLATIONS:** v. 12 8 U.S.C. § 1324(a)(1)(A)(v)(I) 8 U.S.C. § 1324(a)(1)(A)(ii) 8 U.S.C. § 1324(a)(1)(B)(i) Jesus Jimenez-Martinez, 13 (Counts 1-2) (Conspiracy to Transport Illegal Aliens for Profit) 14 Defendant. 15 Count 1 8 U.S.C. § 1324(a)(1)(A)(ii) 8 U.S.C. § 1324(a)(1)(B)(i) 18 U.S.C. § 2 (Transportation of Illegal Aliens 16 17 18 for Profit) Count 2 19

THE GRAND JURY CHARGES:

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COUNT 1

From a date unknown to on or about September 24, 2021, in the District of Arizona, Jesus Jimenez-Martinez, did knowingly and intentionally combine, conspire, confederate, and agree with various other persons known and unknown to the grand jury, to transport and move Ivan Dominguez-Arias, an illegal alien, within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial advantage or private financial gain, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

1 COUNT 2 On or about September 24, 2021, in the District of Arizona, Jesus Jimenez-2 3 Martinez, knowing and in reckless disregard of the fact that an alien, Ivan Dominguez-4 Arias, had come to, entered and remained in the United States in violation of law, did 5 transport and move said alien within the United States by means of transportation or 6 otherwise, in furtherance of such violation of law, and did so for the purpose of 7 commercial advantage and private financial gain, in violation of Title 8, United States 8 Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i) and Title 18, United States Code, 9 Section 2. 10 A TRUE BILL 11 12 /s/ 13 FOREPERSON OF THE GRAND JURY Dated: December 22, 2021 14 GARY M. RESTAINO 15 United States Attorney District of Arizona REDACTED FOR **PUBLIC DISCLOSURE** 16 /s/ 17 RYAN P. DeJOE 18 Assistant U.S. Attorney 19 20 21 22 23 24 25 26 27 28

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